

DECLARATION OF FELIX VALADEZ

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1. My name is Felix Valadez and my date of birth is February 14, 2002. Although the State of Texas may not consider me to be an adult who's old enough to work at an adult bookstore, I am competent to give testimony in this matter and I have personal knowledge of the facts set forth below.

2. I am a 19-year-old man who lives in Dallas County, Texas. I live on my own and I'm responsible for taking care of myself. Just like any other adult, I have to make a living and pay my own bills. I don't have anyone else who can do that for me and I wouldn't want them to because I take pride in the fact that I work and make an honest living to support myself.

3. When I turned 18, I thought I had the personal freedom to make a living doing whatever lawful work that I decided was right for me. So, since about August 2020, I've chosen to work at an adult bookstore in the Dallas-Fort Worth area as a store clerk.

4. The store sells a variety of lawful content and items to consenting adult members of the public, including adult magazines, videos, erotica, and 'novelty' items. Among other things, my job duties include answering customer questions, helping them find the materials or items they might be looking for, restocking inventory, and just making sure that the place is clean and orderly.

5. For many reasons, I like my job, where I work, and this line of work. People from all walks of life and lifestyles—from 60-year-old women to couples—patronize the store. I like helping customers by making recommendations and suggestions and pointing them in the right direction so that they can find what they want.

6. This is the business and line of work that I want to continue working in. It's been around forever, and I don't think it's ever going to slow down. For me, at least, I've learned a lot about this business, the industry, and sales in general just from having to interact with all kinds of people. I've even thought about maybe opening up my own adult bookstore one day.

7. Obviously, no one forced me into this work. No one has ever victimized me or threatened to victimize me because I work at an adult bookstore. Not once have I ever felt that my work has somehow made me unsafe or vulnerable to becoming the victim of any sort of crime. I'm not aware of any criminals loitering around where I work or people engaging in criminal activity. And I've never witnessed or heard of any other employees at my place of work—or at any other adult bookstore for that matter—becoming the victim of crime just because of their work or age.

8. I know people older than 18 but under 21 who, like me, make their living by working at other kinds of sexually oriented businesses, namely strip clubs. I learned about this law going into effect from dancers and waitresses at strip clubs who lost their jobs.

9. Once I heard about how this law put people out of work at strip clubs, I realized that it could result in the loss of *my* job too, all because I happen to be under 21 and I work at a place that's also considered a "sexually oriented business."

10. Now, I'm extremely concerned about suddenly losing my job. For all I know, law enforcement could enter the store tomorrow, unannounced, and say that I can't continue doing the job that I've chosen for myself. Or, the store's management could decide that I can't continue working there because they don't want to take the risk of facing

charges or penalties just because they give me a paycheck for my work. The added problem is that if it's illegal for me to work at the business where I currently work, that would also mean that I can't work at any other adult bookstore at all for the next two years, even though this is my chosen occupation.

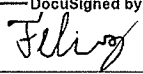
11. I'd be devastated if any of that were to happen. I have rent and other bills to pay. It's not like someone is just going to start paying my bills if I lost my job all of the sudden.

12. It makes no sense to me that even though I can own as many guns as I want, vote, sign an apartment lease, or serve in the military, it could be illegal for me to work at any adult bookstore in the State of Texas. What makes even less sense to me is that even though I can buy and possess lawful adult materials myself (since I'm an adult) that I can't also make a living by selling those same things to other adults.

13. I don't think it's right that anyone else has the right to make my job illegal just because I haven't turned 21 yet. I am extremely concerned that as a result of the change in the law, I could lose my job at any time just because of my age.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 14, 2021.

DocuSigned by:

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FELIX VALADEZ